REMARKS / ARGUMENTS

I. General Remarks and Disposition of the Claims

Claims 1-61 are pending. Claims 1-61 are canceled herein. Applicants have added claims 62-88.

All the above amendments are made in a good faith effort to place these claims in condition for allowance. Applicants reserve their right to take up prosecution on the claims as originally filed in this or an appropriate continuation, continuation-in-part, or divisional application.

II. Rejections of Claims Under 35 U.S.C. § 112

Claims 1-61 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. More specifically, the Examiner stated:

> The claim(s) contains subject matter which was not described in the specification in such a way as to reasonably convent to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Specifically, the claims generically require an enzyme composition that comprises enzymes that are capable of degrading linkages between sugar moieties of succinoglycan. However, the specification does not contain an adequate description for the entire scope of this limitation.

(Office Action at page 2). Applicants have canceled claims 1-61 and therefore, Applicants respectfully request the withdrawal of these rejections.

III. Rejections of Claims Under 35 U.S.C. § 102(b)

Claims 1-7, 9, 10, 41-47, 49, 50, 55, and 58 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Harada*, Methods in Carbohydrate Chemistry; *Dumitriu*, Polysaccharides in Medicinal Applications; and *York*, Proc. Natl. Acad. Sci. (Office Action at pages 7-9). In addition, Claims 1, 2, 8-12, 14-17, 20, 21, 27, 29-32, 37-42, 48-52, 55, 58, and 59 stand rejected under 35 U.S.C. § 102(b) as being anticipated by WO 00/57022 issued to Harris, et al. (Office Action at page 9). Applicants have canceled all of these claims and therefore, Applicants respectfully request the withdrawal of these rejections.

III. Rejections of Claims Under 35 U.S.C. § 103(a)

Claims 1-61 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Harris* et al. in view of *Harada* or *Dimitriu* or *York*, et al and further in view of U.S. Application No 2001/0036905 issued to *Parlar* et al, U.S. Patent No. 5,247,995 issued to *Tjon-Joe-Pin* et al,

and U.S. Patent No. 5,555,937 issued to *Fisk, Jr.* et al. (Office Action at page 11). More specifically, the Examiner stated:

> Tjon-Joe-Pin et al. teaches a method of degrading damaging material within a subterranean formation of a well bore wherein the enzyme treatment degrades guars, celluloses, etc., in a filter cake. It is obvious that if a treatment fluid solely comprising an enzyme that hydrolyzes succinoglycan is used, this treatment fluid would not have any effect on fluid cake which do not comprise of succinoglycan. As noted in Tjon-Joe-Pin et al., the particular enzyme used in a wellbore enzyme treatment is specific to a particular type of polysaccharide (abstract), and thus, a treatment comprising a hydrolase for succinoglycan would not have an effect on filter cakes comprising other polysaccharides with different linkages, such as those recited in instant claim 36 and discussed in Tjon-Joe-Pin et al.

(Office Action at page 14.) While the rejection with respect to claims 1-61 is no longer applicable because these claims are now canceled; in an effort to advance prosecution of new claims 62-88, Applicants respectfully submit that *Harris* in view of *Harada* or *Dimitriu* or *York*, et al and further in view of *Tjon-Joe-Pin* do not teach each and every element of these new claims.

For instance, *Harris* does not teach the limitations of "providing a viscosified treatment fluid comprising succinoglycan, and an enzyme composition selected from the group consisting of *beta*-1,4 glucanases, *beta*-1,3 glucanases, *beta*-1,3;1,4 glucanases, *beta*-1,6 glucanases, and combinations thereof; providing a wellbore penetrating a subterranean formation wherein a filter cake that does not comprise succinoglycan is present in at least a portion of the wellbore; placing the viscosified treatment fluid into the wellbore; and allowing the enzyme composition to react with the succinoglycan in the viscosified treatment fluid so as to reduce the viscosity of the viscosified treatment fluid but not degrade the filter cake allowing the enzyme composition to react with the succinoglycan in the viscosified treatment fluid so as to reduce the viscosity of the viscosified treatment fluid but not degrade the filter cake." Similarly, *Harris* also does not teach the limitations of "providing a viscosified treatment fluid comprising succinoglycan and an enzyme composition selected from the group consisting of *beta*-1,4 glucanases, *beta*-1,3 glucanases, *beta*-1,3;1,4 glucanases, *beta*-1,6 glucanases, and combinations thereof; providing a wellbore penetrating a subterranean formation wherein a filter cake comprising succinoglycan is present in at least a portion of the wellbore; placing the viscosified

treatment fluid into the wellbore; and allowing the enzyme composition to react with the succinoglycan in the viscosified treatment fluid and the filter cake so as to reduce the viscosity of the viscosified treatment fluid and degrade the filter cake." Rather, *Harris* teaches a method of dissolving acid soluble material and also degrading polymeric material using a polymer breaker in a single treatment fluid. (*Harris*, page 15, lines 3-9).

Nor can *Tjon-Joe-Pin* be used to supply these missing recitations. Rather *Tjon-Joe-Pin* only teaches a method of degrading filter cakes and damaging fluids containing guar, derivatized guars, cellulose, derivatized cellulose, starches, derivatized starches, xanthans, and derivitized xanthans. (*Tjon-Joe-Pin*, col. 5, lines 10-38). As such, *Tjon-Joe-Pin* alone, or in combination with *Harris*, does not teach or suggest every element of these claims.

For the foregoing reasons, claims 62-88 are patentable over *Harris* in view of *Tjon-Joe-Pin*. Therefore, Applicants respectfully assert that these claims should be allowed.

IV. No Waiver

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinction discussed by Applicant is sufficient to overcome the anticipation and obviousness rejections.

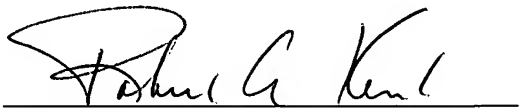
SUMMARY

In light of the above remarks, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections. Applicants further submit that the application is now in condition for allowance, and earnestly solicit timely notice of the same. Should the Examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the attorney of record by telephone, facsimile, or electronic mail.

Applicants believe that there are no fees due in association with this filing of this Response. However, should the Commissioner deem that any additional fees are due, including

any fees for extensions of time, Applicants respectfully request that the Commissioner accept this as a Petition Therefor, and direct that any additional fees be charged to the Deposit Account of Halliburton Energy Services, Inc., No. 08-0300.

Respectfully submitted,



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